

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

BEAUMONT BRANCH OF THE NAACP and
JESSICA DAYE,

Plaintiffs,

Civil Action No. 22 Civ. 488

v.

JEFFERSON COUNTY, TEXAS, JEFFERSON
COUNTY COMMISSIONERS COURT, LAURIE
LEISTER, in her official capacity as the JEFFERSON
COUNTY CLERK, and MARY BETH BOWLING, in
her official capacity as the PRESIDING JUDGE OF
THE JOHN PAUL DAVIS COMMUNITY CENTER,

Defendants.

**DECLARATION OF JOYCE ROPER IN SUPPORT OF PLAINTIFF'S EMERGENCY
MOTION FOR A TEMPORARY RESTRAINING ORDER**

I, JOYCE ROPER, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the below is true and correct:

1. I have lived in the North End of Beaumont in Jefferson County for my whole life.

I am 71 years old. I am a citizen and I am eligible to vote in Texas. I identify as a Black woman.

2. I registered to vote when I was in my thirties, and I've voted in nearly every election since then.

3. For the past four or five years, I have served as a voter assistant at the John Paul Davis Community Center (the "Community Center") in Jefferson County. I learned how to help voters when I happened to stop by a table in the lobby of my apartment building where a woman was assisting people in registering to vote, applying for absentee ballots, and the like. I sat down

next to her and asked if I could help. I fell in love with helping voters. People come to me because they need help and I do my best to provide it. I've helped voters in my community in four or five elections.

4. During the past two weeks of early voting in Texas between October 24 and November 4, I worked at the Community Center as a voter assistant. This year, I worked every single day of early voting at the Community Center. On all but one day, I stayed for the entire day of voting.

5. I like to assist voters at the Community Center because it is close to my house, my neighborhood, and my community. I would estimate that our Community Center serves a population that is about ninety percent Black and ten percent White.

6. After starting my work on October 24, I immediately noticed three serious changes in the practices at the Community Center.

7. First, on my routine trips through the polling place with voters who had requested assistance, I noticed that Black voters were repeatedly and aggressively asked to recite their address by White poll workers as they were checking in at the polling place. Again and again, I saw Black voters being interrogated about their address, even after handing over their license to the poll worker and confirming their address was still correct. On one occasion, I watched a Black woman be subjected to this treatment by a White poll worker. The Black woman took her license back from the White poll worker and was getting ready to leave. It was only after one of the Black poll workers intervened that she decided to stay and vote. I saw plenty of White voters cast ballots while I was in the Community Center, but I never saw a single White voter be questioned about their address, their identification, or anything else.

8. Second, I was repeatedly followed around the polling place by White poll workers as I assisted voters. Usually at any given time during the day there are White and Black poll workers within the polling place. I have never before experienced any issues with White or Black poll workers at the Community Center. This cycle, on several occasions during early voting, White poll workers followed me around the polling place as I assisted people through the voting process.

9. On one such occasion, Ms. Mary Beth Bowling, a White poll worker, came and stood right behind me as I was assisting an elderly Black man. I turned around and told her that this was not a spectator sport and she needed to move around. I specifically told her she could not watch over the voter's shoulder as he made his selections. Ms. Bowling was maybe two feet behind me at this time. After I asked her again to move around, she moved away. The voter I was assisting was upset; he asked me what Ms. Bowling was trying to do. I told the voter not to worry and that we would just focus on his voting. I felt intimidated by Ms. Bowling hovering over me and looking over my shoulder. I did not ask for her help. I knew she should not be coming up close behind me. I could see that the voter felt intimidated, too. I have never ever experienced this sort of thing at the Community Center. We have never been through this before.

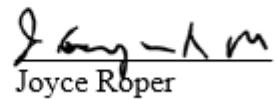
10. Third, it always struck me that when a White voter was in the Community Center, the White poll workers helped the voter to submit their voted ballot into the scanning machine. These White poll workers gave White voters directions and talked them through the process of voting with our new machines. They never gave that kind of help to Black voters. On several different occasions, I finished assisting someone with the voting process and found a handful of Black voters waiting at the end of the voting process unsure what to do with their voted ballots. I walked them through how to scan their ballots and effectively cast their votes. I made sure they

got the information they needed. But the White poll workers in the Community Center were not trying to help.

11. Over the course of the ten days that I assisted voters at the Community Center, I spent a lot of time outside the polling place waiting for voters who asked for my assistance. During this time, I often talked to community members who were heading into the polls to vote or heading out of the polls having already voted. What is most alarming to me is that over the course of ten days of early voting, more than sixty voters told me they felt intimidated, uneasy, and uncomfortable voting in the Community Center. All of these stories came from Black voters. And they all centered on the same issues I was noticing: an aggressive interrogation when Black voters tried to check in, surveillance of Black voters as they worked their way through the polling place, and a failure to assist Black voters in successfully casting their votes using the new scanning machines. I have never heard so much negative feedback about the voting process in my life, but it was important for me to hear it as it motivated me to work even harder to identify voters that were in need of assistance during the voting process, and to closely observe the events happening around me.

Executed on November 6, 2022 in the City of Beaumont, Jefferson County, Texas

BY:


Joyce Roper